

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

NEXTGEAR CAPITAL, INC. )  
                          )  
Plaintiff,             )  
                          )  
v.                      ) CIVIL ACTION NO. 1:21-cv-2352-JMS-MJD  
                          )  
                          )  
MOHAMED AHMED BIBAS, )  
                          )  
Defendant.            )

**MOTION TO WITHDRAW APPEARANCE**

George M. Plews, Colin E. Connor and Nicholas J. Bognanno of the law firm of Plews Shadley Racher & Braun LLP (collectively, "Attorneys") hereby respectfully request to withdraw their appearances as counsel for Defendant Mohamed Ahmed Bibas ("Defendant"). In support, Attorneys state as follows:

1. Plaintiff and Defendant have negotiated, and executed, a settlement agreement. That settlement should result in dismissal of this case within 60 days, as the Magistrate ordered earlier this week.
2. Defendant has requested that counsel cease providing any further services in the matter. A true and accurate copy of that written request, redacted to protect privileged communications, is attached as **Exhibit A**.
3. Counsel for Defendant notified Defendant on September 2, 2020, that they would file their withdrawal within seven (7) days, falling on September 9, 2020. A true and accurate copy of the notice of withdrawal to Defendant is attached

as **Exhibit B.**

4. Mr. Bibas's last known address is 4337 Royce Street NE, Columbia Heights, MN 55421 and his phone number is (956) 703-8037.

WHEREFORE, George M. Plews, Colin E. Connor, and Nicholas J. Bognanno respectfully request that the Court grant them leave to withdraw their appearances on behalf of Mohamed Ahmed Bibas, and all other just and proper relief.

Respectfully submitted,

*/s/ Nicholas J. Bognanno*

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was served on all counsel of record by the Court's electronic filing system on September 9, 2021.

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/s/ Nicholas J. Bognanno